

SECTION III—REMARKS

This amendment is submitted in response to the Office Action mailed November 28, 2005. Claim 1 is amended and claims 10-19 are canceled. Claims 1-6 and 9 remain pending in the application. Applicants respectfully request reconsideration of the application and allowance of all pending claims in view of the above amendments and the following remarks.

Rejections Under 35 U.S.C. § 102

The Examiner rejected claims 1-3 and 5 as anticipated under 35 U.S.C. § 102(b) by U.S. Patent No. 5,436,203 to Lin ("*Lin*"). Applicants respectfully traverse the Examiner's rejections. A claim is anticipated only if each and every element, as set forth in the claim, is found in a single prior-art reference. MPEP § 2131; *Verdegaal Bros. v. Union Oil of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). As explained below, *Lin* cannot anticipate these claims because it does not disclose every element and limitation recited therein.

Claim 1, as amended, recites an apparatus combination including a die mounted on a substrate, the die being connected to the substrate by a plurality of wires, and a mold cap encapsulating the die and the plurality of wires, the mold cap comprising an electrically insulating portion encapsulating substantially all the wires and the entire die, and a thermally conductive portion encapsulating substantially all the electrically insulating portion wherein "the thermally conductive material is in contact with the entire part of the surface of the electrically insulating material that is not in contact with the substrate, the die or the wires."

Lin does not disclose a combination including the recited limitations. Instead, *Lin* discloses a semiconductor die 32 attached to a substrate 12 by wires 36 and surrounded by two dam structures 40 and 44. A first encapsulant 38 is dispensed into the dam structure 40 to encapsulate the die 32. A second encapsulant 42 is then dispensed into the larger dam structure 44 to encapsulate the die 32, the first encapsulant 38 and the dam structure 40. Because the dam structure 40 surrounds the first encapsulant 38, the second encapsulant 42 is not in contact with the entire part of the surface of first encapsulant 38 that is not in contact with the substrate, the die or the wires. *Lin* therefore does not disclose, teach or suggest a combination including a thermally conductive portion encapsulating substantially all the electrically insulating portion wherein “the thermally conductive material is in contact with the entire part of the surface of the electrically insulating material that is not in contact with the substrate, the die or the wires.” For the reasons above, Applicants submit that *Lin* can anticipate the claim. Applicants therefore respectfully request withdrawal of the rejection and allowance of the claim.

Regarding claims 2-3 and 5, if an independent claim is allowable, then any claim depending therefrom is also allowable. *See, e.g.*, MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, claim 1 is in condition for allowance. Applicants submit that claims 2-3 and 5 are therefore allowable by virtue of their dependence on an allowable independent claim, as well as by virtue of the features recited therein. Applicants therefore respectfully request withdrawal of the rejections and allowance of these claims.

Rejections Under 35 U.S.C. § 103

The Examiner rejected claims 4, 6 and 9 under 35 U.S.C § 103(a) as obvious in view of, and therefore unpatentable over, *Lin* in view of U.S. Patent No. 6,309,915 to DiStefano (“*DiStefano*”). Applicants respectfully traverse the Examiner’s rejections. If an independent claim is non-obvious under 35 U.S.C. § 103, then any claim depending therefrom is also non-obvious. MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, independent claim 1 is in condition for allowance. Applicants submit that claims 4, 6 and 9 are therefore allowable by virtue of their dependence on an allowable independent claim, as well as by virtue of the features recited therein. Applicants therefore respectfully request withdrawal of the rejections and allowance of these claims.

Conclusion

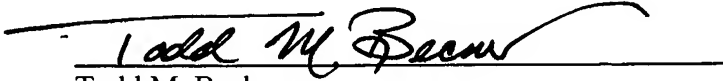
Given the above amendments and accompanying remarks, all claims pending in the application are in condition for allowance. If the undersigned attorney has overlooked a teaching in any of the cited references that is relevant to allowance of the claims, the Examiner is requested to specifically point out where such teaching may be found. Further, if there are any informalities or questions that can be addressed via telephone, the Examiner is encouraged to contact the undersigned attorney at (206) 292-8600.

Charge Deposit Account

Please charge our Deposit Account No. 02-2666 for any additional fee(s) that may be due in this matter, and please credit the same deposit account for any overpayment.

Respectfully submitted,

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